



## Office of the Special Narcotics Prosecutor for the City of New York

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March 24, 2021

### **BY ELECTRONIC DISCOVERY**



Re: 

Dear Counsel:

This disclosure letter concerns UNDERCOVER 320 (UC 320) Shield #00320 of the New York City Police Department ("the Department"), presently assigned to NYPD, whom the People intend to call as a witness in this case. In addition to the information below, police disciplinary information exists in various formats online, including in databases located at: <https://www1.nyc.gov/site/ccrb/policy/MOS-records.page> and <https://nypdonline.org/link/2>. Information concerning UC 320 may or may not be included in these databases, and the People are unable to verify the database's general accuracy.

There are currently no pending or substantiated allegations against UC 320.

Pursuant to People v. Garrett, 23 N.Y.3d 878 (2014), the People are disclosing the following list of civil lawsuits in which UC 320 has been named in his/her capacity as a member of law enforcement.

The People identified the lawsuits listed below primarily using public databases and information, including a list of lawsuits alleging misconduct by the NYPD and its individual officers which is published every six months on the New York City Law Department's web site, available at <https://www1.nyc.gov/site/law/public-resources/nyc-administrative-code-7-114.page>. Publicly-available litigation materials related to these lawsuits are also being provided, to the extent the materials currently are in the People's possession.

CASE NAME: MINGO, SEAN VS CITY OF NEW YORK, ET AL.

CASE NUMBER: 19CV05806; COURT: U.S. DISTRICT COURT - EASTERN DISTRICT NY;  
LITIGATION START DATE: MON OCT 21 2019

Allegations of misconduct that have not been substantiated and are not pending (including, but not limited to, findings of unsubstantiated, unfounded, and exonerated) are not subject to disclosure and generally are not included in this letter. Additionally, the decision to include information in this letter does not represent a conclusion by the People that all the information contained herein is required to be disclosed under the People's constitutional, ethical or statutory obligations. The People reserve the right to move in limine to preclude or limit reference to the information in this letter in any further proceedings in this prosecution.

If you have any questions, feel free to contact me at (212) 815-0135.

Sincerely,

*Max Bernstein*  
Assistant District Attorney